

EXHIBIT 6

From:
Sent: Thursday, March 27, 2025 4:49 PM
To: 'Murphy, Michael D.'; 'Zollicoffer, Jordan'
Cc: Beral, Arash
Subject: RE: Meet and confer

Michael,

I am writing to confirm what we agreed to, discussed and tabled today during our meet and confer this afternoon:

1. Protective Order: You agreed to send to us the Protective Order we approved and told the Magistrate Judge we approved after you fixed automatic numbering, so we can get it on file today.
2. Response to Interrogatory No. 1: You said we would have Plaintiff's interrogatory response tomorrow or by Monday.
3. Document production: You said we would have Plaintiff's initial production of documents tomorrow or by Monday.
4. Search terms: After discussion, you confirmed you would do as agreed and provide to us the search terms used/being used to gather documents. Once we receive the search terms (which I reiterated should include the subject matter of each RFP as reviewed and permitted by the Magistrate Judge), we will provide our comments/supplementation, if any, as directed by the Magistrate Judge.
5. RFP No. 29: In addition to what you have already agreed to produce, you said you would confirm whether Plaintiff will also produce all documents and communications (including agreements and contracts) with its suppliers (including Ferna and Newly Webs) re: Plaintiff's alleged trade secret ingredients (as set forth in Plaintiff's initial trade secret disclosure, including the ingredients, ingredient allocations, and recipes for making the flavored seasonings).
6. RFP No. 30: You said you meant to agree (and agreed) to produce "all" non-privileged responsive documents.
7. RFP No. 31: You said you would confirm whether Plaintiff will agree to produce all board minute meetings and notes from discussions of the alleged trade secrets (including as initially disclosed).
8. RFP No. 32: You agreed to produce all communications with PCJV and non-privileged internal documents and communications relating to the quoted contention in Plaintiff's complaint.
9. RFP Nos. 33-34: You requested support that services include licensing (which is apparent from the subject matter of the question) even after I provided that clarification. I responded that I will provide to you what we intend to argue to the Magistrate Judge, including that the clarification disposes of the objection, after which you said you would consider it and confirm whether Plaintiff will produce documents.
10. RFP No. 35: You objected to producing documents Plaintiff may use at trial and requested a *quid pro quo* citing Rule 26, which involves initial disclosures not a document request. I objected to the requested *quid pro quo* as non-responsive but indicated I would speak with Arash and get back to you.
11. RFP No. 36: Until the definition of "any FRANCHISEE" was before you, you would not answer whether Plaintiff will produce all non-privileged documents and communications with PCJV's franchisees, who remain under contract with PCJV as franchisees until a court rules upon any purported claim of rescission, which has not occurred.
12. 2nd set of interrogatories: We will pick up with RFP No. 36 and Plaintiff's 2nd set of interrogatories tomorrow at 2:00 pm.

Please email me a copy of the Protective Order, so we can get that one file today.

Regards,

Todd

Todd M. Malynn | BLANKROME

2029 Century Park East | 6th Floor | Los Angeles, CA 90067

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From: Malynn, Todd M.

Sent: Thursday, March 27, 2025 3:01 PM

To: Murphy, Michael D. <mdmurphy@foxrothschild.com>; Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>

Cc: Beral, Arash <arash.beral@blankrome.com>

Subject: RE: Meet and confer

Mike, AJ circulated a Teams call in for 3:00 pm. I'm on.

Regards,

Todd

Todd M. Malynn | BLANKROME

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From: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Sent: Thursday, March 27, 2025 2:39 PM

To: Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>

Subject: Meet and confer


Todd:


I got sucked in to a fire drill.

Free to continue this at 3



Michael Murphy
Partner

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